

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

PRISON LEGAL NEWS and
HUMAN RIGHTS DEFENSE CENTER,

Plaintiffs,

v.

BERKELEY COUNTY SHERIFF
H. WAYNE DEWITT, individually and
in his official capacity; CAPTAIN
CLIFF McELVOGUE, individually and in
his official capacity; LIEUTENANT
TONY RILEY, individually and in his
official capacity; JOHN DOE 1,
Berkeley County Detention Center
employee, individually and in his/her
official capacity; JOHN DOE 2,
Berkeley County Detention Center
employee, individually and in his/her
official capacity; JOHN DOE 3,
Berkeley County Detention Center
employee, individually and in his/her
official capacity; JOHN DOE 4,
Berkeley County Detention Center
employee, individually and in his/her
official capacity,

Defendants.

Civil Action No.: 2:10-cv-02594-MBS

**AFFIDAVIT OF
PATRICK ALEX GARRETT**

NOW COMES, Patrick Alex Garrett, affiant, and after being duly sworn, states and affirms as follows:

1. My name is Patrick Alex Garrett. I am over the age of 21 years and am a resident of Berkeley County, South Carolina.
2. During all relevant times, I have been a lock consultant with DNA Lock and Repair. I have many years of experience in working with and repairing locks in the past.
3. I have received many requests to come and repair locks within the Hill-Finklea Detention Center.

4. I act as a consultant and trained Deborah Garrett in repairing the jail locks. She is the owner and operator of DNA Lock and Repair.
5. In my experience, as little as one (1) staple can cause a lock to jam, which requires an expensive repair. Attached are invoices from repairs conducted in 2010 and 2011. Though the invoices don't necessarily specify staples as the culprit, my recollection and my wife's recollection, is that staples in the locks were the cause of a number of these repairs. Prisoners drop the staples into the key cylinder making it impossible for a key to turn. This makes it necessary to repair.

FURTHER, AFFIANT SAYETH NAUGHT!

Patrick Alex Garrett

SWORN TO AND SUBSCRIBED before
me this _____ day of _____, 2011.

NOTARY PUBLIC FOR SOUTH CAROLINA
My commission expires: _____